

Koch, Kristine

From: Koch, Kristine
Sent: Friday, August 22, 2014 8:51 AM
To: 'Gene Revelas'; 'jim.mckenna@verdantllc.com'
Subject: RE: Portland Harbor RI Section 5 - Section 5.4 need feedback on MCL issue before 9 am today if possible

Under Oregon State Administrative Rules, OAR 340-041-0340, Table 340A, the designated beneficial use of the lower Willamette River includes private and public domestic water supply after adequate pretreatment to meet drinking water standards. There are no known current or anticipated future uses of the lower Willamette River within Portland Harbor as a private or public domestic water supply. As such, their use in this section is solely as values for comparison.

Kristine Koch
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From: Gene Revelas [mailto:grevelas@integral-corp.com]
Sent: Friday, August 22, 2014 8:46 AM
To: Koch, Kristine; jim.mckenna@verdantllc.com
Subject: FW: Portland Harbor RI Section 5 - Section 5.4 need feedback on MCL issue before 9 am today if possible

6.2.2.3 Potential Future Domestic Water Use

The evaluation of surface water as a domestic water source is based on the assumption that surface water is drawn from the Study Area. Within the Study Area, the LWR is not currently used as a domestic water source. According to the City of Portland, the primary domestic water source for Portland is the Bull Run watershed, which is supplemented by a groundwater supply from the Columbia South Shore Well Field (City of Portland 2008). In addition, the Willamette River was determined not to be a viable water source for future water demands through 2030 (City of Portland 2008). Thus, it is unlikely that individuals at households receiving water from the city would be exposed to contaminants at concentrations greater than the MCL.

City of Portland. 2008. Water Management and Conservation Plan, Final Draft Report. Portland Water Bureau. Portland, OR, March 2008.

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HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Bill Locke
Sent: Wednesday, August 20, 2014 7:29 AM
To: Gene Revelas
Cc: Sandy Browning; Laura Jones; Jarrod Gasper; Alice Wood Conovitz; Craig Hutchings
Subject: Re: Portland Harbor RI Section 5 - Section 5.4 need feedback on MCL issue before 9 am today if possible

All,

To add some nuance to my initial response on this topic, it may be that Region 10 is taking the position that MCLs, even if not directly "applicable" due to the pretreatment requirement, are a "relevant and appropriate" requirement for the water column from the standpoint of the CERCLA cleanup. In that sense, the issue may tie directly into the status of the ARARs evaluation in the FS. I do not know where the LWG stands on this topic, but it would not surprise me if it was something they would want to challenge.

Bill

Sent from my iPhone.

On Aug 20, 2014, at 8:06 AM, "Bill Locke" <wlocke@integral-corp.com> wrote:

Gene,

I agree with taking this issue back to Jim McKenna and the LWG exec committee. Kristine's position on MCLs and the pretreatment requirement, as reflected in Laura's notes, strikes me as another example of the EPA project manager possibly going beyond her authority and taking arbitrary positions that may reflect a personal bias. It is not up to Kristine or Region 10 to agree or disagree with the State water quality standards.

Based in a quick scan of the remaining Section 5 issues, I agree that none of the others seem to rise to the same level.

Bill

Sent from my iPhone.

On Aug 20, 2014, at 7:32 AM, "Gene Revelas" <grevelas@integral-corp.com> wrote:

Folks –

It appears we struck out all references to the MCL is our revised RL/SO to EPA (or that was our intent) and EPA has re-inserted those comparisons. Is this correct?

I want to inform LWG Exec of this issue today and request their guidance on how we should proceed. I.e., do they want to dispute this comparison in the RI at this time? Has there been any update on this topic? since Laura's meeting notes on the topic which stated:

KK says MCLs are a WQ criteria because LWR can be used as a drinking water source. JM – table says with pretreatment. KK – we don't agree with pretreatment. KK – not much of a problem. GR – we struck out MCLs – do we need to bring this back to the group? Is this an EPA directive? This is a policy decision. JM – will be taken back to LWG. JM – will take this back to LWG.

My read is that this is only Section 5 issue that rises to that level. Do folks concur with this assessment?

Thanks,

Gene

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HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Sandy Browning
Sent: Tuesday, August 19, 2014 11:27 AM
To: Gene Revelas; Laura Jones; Jarrod Gasper; Alice Wood Conovitz; Craig Hutchings
Cc: Bill Locke
Subject: FW: Portland Harbor RI Section 5

All,

Here's the email exchange with Kristine regarding our comments on EPA's agreed upon revisions in Section 5. Jen has set up a meeting with EPA for Friday at 8:30 PDT to discuss the few items Kristine wants to discuss below. Surface water is one of them. Have a look and let us know if you have any outstanding questions/concerns. Laura and Jarrod, you may want to be on the call if you can.

As a reminder, we haven't seen the LWG's comments on EPA's revised Section 5. Gene is asking Jim about that schedule today. Any additional issues need to be resolved by the 29th. Not much time!

Sandy

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]
Sent: Tuesday, August 19, 2014 9:14 AM
To: Jennifer Woronets
Cc: Jim McKenna (jim.mckenna@verdantllc.com); Gene Revelas; Sandy Browning; Bob Wyatt; Patty Dost
Subject: RE: Portland Harbor RI Section 5

Jim – See my responses below. Let me know if you need to convene a call to discuss further.

Regards,

Kristine Koch
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From: Jennifer Woronets [<mailto:jworonets@anchoragea.com>]
Sent: Friday, August 15, 2014 5:17 PM
To: Koch, Kristine
Cc: Jennifer Woronets; Jim McKenna (jim.mckenna@verdantllc.com); Gene Revelas; sandy browning (sbrowning@integral-corp.com); Bob Wyatt; Patty Dost
Subject: FW: Portland Harbor RI Section 5

Kristine,

Please see below from Jim.

Let us know if you have any questions.

Thank you,
Jen Woronets ☺
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From: James McKenna [<mailto:jim.mckenna@verdantllc.com>]
Sent: Friday, August 15, 2014 4:05 PM
To: Jennifer Woronets
Cc: Laura Jones (ljones@integral-corp.com); Gene Revelas (grevelas@integral-corp.com); Bob Wyatt; Patty Dost
Subject: RE: Portland Harbor RI Section 5

Kristine,

Integral has completed a review of your revised RLSO of RI Section 5. Your edits were aimed at reflecting the changes we discussed during our recent informal technical meetings. Based on Integral's review, we note the following:

Section 5.0:

- 1) No issues.

Section 5.1 (Selection of Indicator Contaminants):

- 1) Outstanding issue for BERA screen on TCDD TEQ and monobutyltin. All others resolved.

TCDD TEQ is the same as dioxin/furan TEQ. The BERA clearly identifies this as a CPPUR. Monobutyltin is not a BERA CPPUR, so all tables, maps, figures and discussions (including appendices) needs to delete information on this contaminant. The screening table will need to be updated.

Sandy: Confirmed monobutyltin is not discussed or presented in Section 5.2. TCDD TEQ is covered in the text and data products, so it's a matter of making nomenclature clear in Table 5.1-2.

Section 5.2 (Bedded Sediment):

- 1) 5.2.12.2 – Downtown Reach. Add "mean" to the sentence, "Concentrations ranging from 0.4 J to 1,990 µg/kg, with a mean concentration of 74.6 µg/kg (Table 5.2-15a)."

Agreed.

Section 5.3 (Sediment Traps):

- 1) 5.3.1 – Change RM “11.5” to RM “11.8”

This change seems inconsistent with FSR. See attached.

Sandy: We’re using the definition of the SA, and she is basing the description off the map which shows ST007 and ST008 at RM 11.5. We will simply need to agree on the same approach for this description.

- 2) 5.3.4.1 – Last paragraph – add “suspended sediment” to the sentence, “This observation suggests more influence of the localized elevated suspended sediment levels on the material being deposited in the traps during low flows.”

Agreed.

- 3) 5.3.6.1 – Last sentence of last paragraph – Make the following revisions for accuracy, “The elevated detection limits could obscure low concentrations of DDx. In addition, ~~9~~ 36.5 percent of the results were qualified as tentatively identified and estimated (NJ) during data validation due to poor confirmation, and another ~~15~~ 49.2 percent were estimated (J) as a result of the confirmation data.”

Agreed, but not sure why 3 significant figures is necessary for the percentiles. Two should be sufficient; 37 and 49 percent, respectively. **Sandy: We should be consistent with Craig’s recommendation.**

Section 5.4 (Surface Water):

- 1) Clarification needed in Section 5.4.8.1 - EPA added a note to retain some text (a discussion of MCLs), but may have accepted the accompanying deletion by accident.

This is a possibility. We can discuss further. **Sandy: Laura and/or Jarrod will need to be on the call.**

- 2) Outstanding issue for retaining the screening discussions against MCL values.

Need more information to understand outstanding issue. **Where does the LWG sit on this issue?**

Section 5.5 (TZW):

- 1) Clarification needed in Section 5.5.1.1 - Text and footnotes on page 5.5-3: Need to clarify that EPA agrees that this text and footnotes 3, 4 and 5 are to be retained where currently placed in the text. Based on the 8/1/14 it was our understanding this text and footnotes should be retained here and the strikeout should be removed. (*The strikeout is what is confusing us.*)

Sorry for the confusion. My note says that it is OK to retain both language and footnotes.

- i. Text to retain: Two general types of sampling techniques were used to collect the TZW samples: diffusion samplers (small-volume peepers) and push probe samplers (Trident and Geoprobe tools were used as push probe samplers). These are described in detail in the Pilot Study FSP (Integral 2004a). All peeper samples were collected over the depth interval of 0 to 38 cm bml. Trident samples were collected at 30 cm bml, with a few deeper samples collected between 90 and 150 cm bml.[1] Geoprobe samples were collected at depths ranging from 30 to 6,300 cm bml, though only Geoprobe samples from 0 to 90 cm bml are presented in this discussion of TZW nature and extent.
- ii. Footnotes to retain:

- (3) One Trident sample was collected at 60 cm bml at location CP-07-B. This sample is included with the 90 to 150 cm bml data set.

- (4) Geoprobe data collected at 91 cm bml was collected for naphthalene and is included in Appendix D.

- (5) For the Gasco study (sample IDs that begin with “GS-”), the sample collected at the uppermost depth in the 0 to 90 cm bml interval at each location is presented on maps to represent the TZW concentrations in the shallow layer. No deeper data collected as part of the Gasco study is presented. Only one sample (GS-C2, 73 to 103 cm bml) in the 2007 Gasco Investigation was collected in the deeper (90 to 150 cm bml) sample interval; this sample is not included in this nature and extent discussion. For the Siltronic study (sample IDs that begin with “GP-”), samples collected at 31 cm bml are presented as shallow TZW.

Section 5.6 (Biota):

- 1) At this time we do **not** have any further questions regarding EPA’s few editorial revisions as well as EPA’s comment to revise Section 5.6.3.1.2 sentence, “Twenty-five whole body composite samples of sculpin were collected and submitted to the laboratory for dioxin/furan ~~toxic equivalent~~ analysis”.

It is our recommendation that we convene a short phone call early next week to discuss just a few of these issues (e.g., Section 5.1 re BERA screen of TCDD TEQ and monobutyltin; Section 5.4 re clarify deleted text about screening MCLs; and Section 5.5 re clarify retaining text and footnotes 3, 4 and 5). I think 30 minutes would suffice. We are hopefully all the other suggested changes listed above are acceptable to you and we do not need to discuss them (please confirm).

Let me know if you want Jen to get a conference call arranged early next week so we can resolve these issues.

Thanks,

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From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]
Sent: Monday, August 11, 2014 2:24 PM
To: Bob Wyatt (rjw@nwnatural.com); James McKenna
Cc: Jennifer Woronets; Sheldrake, Sean
Subject: Portland Harbor RI Section 5

Bob and Jim – I have reviewed all the edits LWG has proposed to the modifications EPA made to this section. While I haven't removed all the redline/strikeout text, I'm approving the edits as they currently exist in this version. We have discussed and agreed to language in Sections 5.0 through 5.5. I have agreed to the majority of the edits made to Section 5.6, with a few noted exceptions redlined in the document. Please look over the attached documents and see if you are in agreement with the current version. Let me know if we need to discuss further.

Regards,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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